Irathane Systems Incorporated

Industrial Park • Hibbing, Minn. 55746 U.S.A. • Phone: 218/262-5211 Telex: 29-4446

May 20, 1981

5/21

Mr. Dick Kable
Emergency Response Unit - MPCA
1935 W. Co. Rd. B2
Roseville, Mn 55113

Attached please find a copy of the CONTINGENCY PLAN for Irathane Systems Incorporated, Hibbing, Minnesota. This plan is required of companies involved in the storage of hazardous waste by both the E.P.A. (Environmental Protection Agency) and the M.P.C.A. (Minnesota Pollution Control Agency). According to these agencies, a copy of this plan must be kept on file with the local authorities, including the fire department, police department and hospital; in addition to the State Emergency Response Team.

Please file this Contingency Plan with other information which has been submitted from Irathane Systems.

Sincerely,

Laurie Potter
Environmental Consultant

LP:nb
cc: W.J. Valeri
Gary Boyd

✓ L. Potter
4/15/81

IRATHANE SYSTEMS
Industrial Park
Hibbing, Mn 55746
218-262-5211

CONTINGENCY PLAN

April 1981

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CONTINGENCY PLAN

INTRODUCTION

The following Contingency Plan is designed to minimize the hazards to human health and the environment in the event of a spill, fire, or explosion. The plan details procedures to be followed should any of the above listed sudden occurences take place. The Contingency Plan includes an evacuation plan, a list of emergency equipment, the responsibilities of the emergency coordinator and arrangements made with local authorities. The provisions of the Contingency Plan must be carried out whenever a sudden occurence takes place.

CONTINGENCY PLAN

1. PREVENTION OF ACCIDENTS:

1.1 Dress

1.1.1 When working in either of the two Irathane shop areas, dress should always include long sleeved work cloths and goggles or side shield glasses as required in each shop.

1.2 Eating/Smoking

1.2.1 Prior to eating or smoking (shop personnel), outer work clothing should be removed and hands, face and forearms should be thoroughly washed.

1.2.2 Eating and smoking should be confined to the lunchroom or office areas.

1.3 Ventilation

1.3.1 Ventilation systems should be turned on (when working) in areas of localized solvent or isocyanate concentrations.

1.3.2 Organic cartridge/canister masks should be worn (if not already required in that area) if solvent fumes become uncomfortable. (See Policy 26, 27, A,B)

1.4 Fire Prevention

1.4.1 An open flame should never be used in a solvent area or in an area where the solvent smell is strong. (The "NO SMOKING" sign is posted to prevent this occurence).

1.4.2 Any container with a red label should be grounded to prevent static sparks from igniting its contents during transfer operations.

1.5 Empty Drums

1.5.1 No empty drums should be taken home for storage or trash.

1.5.2 An empty drum should be handled in a similar manner to a full drum of the same material since residue and/or vapors may still be present in the drum .

1.6 Release of Pressure in Drums

1.6.1 If after heating a drum either head on the drum is slightly bulged, the following should be done:

a. The drum should be carefully moved to a cool area and pressure caused by heating should be released.
b. If cooling does not release pressure, the drum should be carefully drilled through the bung cap at its thickest point to slowly release the pressure.

1.6.2 If a non-heated drum is slightly bulged on either head, the bung cap should slowly be released to relieve the pressure.

1.6.3 If a non-heated drum is severely bulged, the procedures described in 1.6.1(b) for drilling the bung cap should be followed.

2. ACCIDENTS

2.1 Spills

2.1.1 Personal Spills

2.1.1.1 Whenever a chemical is spilled/splashed onto the skin, the area should be immediately washed with soap and water.

2.1.1.2 If material is splashed/spilled into the eyes, the eyes should be flushed in the eye bath for 5 - 15 minutes.

2.1.1.3 If a work uniform is splashed/spilled upon to a sufficient extent to soak through to the skin, the uniform should be removed and laundered prior to reuse.
The skin should be washed as in 2.1.1.1.

2.1.1.4 The Emergency Coordinator should be notified of any personal spill. (Fig. 1).

2.1.1.5 A doctor should be contacted for any spills/splashes of liquid chemicals in the eyes, excluding solvents but including DMF (Dimethyl formamide).

2.1 Spills - continued

2.1.2 Spill of Solid Chemicals

2.1.2.1 Any solid chemical spill should be swept up thoroughly and placed in a closed container marked for the spilled chemical.

2.1.2.2 The Emergency Coordinator should be notified in writing of solid chemical spills in excess of one gallon.

2.1.3 Spill of Liquid Chemicals (large & small, except prepolymers, mixed materials and pure isocyanates)

2.1.3.1 If a small spill occurs (less than 10 gallons), organic cartridge/canister masks should be worn and the ventilatio should be turned on.

2.1.3.2 If a large spill occurs (greater than 10 gallons) all available ventilation should be turned on and the area should be evacuated until fresh air masks can be obtained.

2.1.3.3 A complete uniform should be worn in addition to the above-mentioned masks.

2.1.3.4 The Emergency Coordinator should be notified of the liquid spills in excess of 10 gallons.

2.1.3.5 An excessive amount of absorbing agent should be spread over the spill and should be allowed to soak up most of the liquid.

2.1.3.6 This material should be swept up and disposed of in a labeled, sealed container.

2.1.3.7 A second covering of absorbing agent should be spread over the spill area and disposed of as listed above.

2.1.3.8 If the spilled material contains a flammable solvent, other personnel should be standing by with an ABC fire extinguisher.

2.1.3.9 The area should be marked as "Extremely Hazardous" until the area is completely dry.

2.1 Spills - continued

2.1.4 Small liquid spill of prepolymer (less than 10 gal.) and small spill of pure isocyanate (less than one quart).

2.1.4.1 An organic cartridge mask should be put on immediately following a small prepolymer spill and all ventilation should be turned on. (In areas of poor or no ventilation a fresh air mask should be worn).

2.1.4.2 The Shop Foreman should be notified of the small spill Reference pages for recommended procedures in case of eye or skin contact.

2.1.4.3 The spill should be immediately covered with absorbing agent.

2.1.4.4 IRA F-56 Solution should then be poured over the spill and allowed to react for ten minutes minimum.

2.1.4.5 The residue should be scooped up and placed in an open container for further decontamination (the container should be marked as "Hazardous Waste").

2.1.4.6 The spill area should be mopped up with IRA F-56 and clearly marked as "Hazardous Area" until the floor has completely dried.

2.1.5 Large spill of prepolymer (more than 10 gallons) and large spill of pure isocyanate (more than one quart).

2.1.5.1 If a large spill occurs, all personnel should immediately evacuate the area. The Emergency Coordinator should be notified immediately if the spill is more than one drum of prepolymer or more than five gallons of pure isocyanate. Notify the on-duty foreman for smaller spills.

A written report describing the spill must be submitted to the Emergency Coordinator by the department foreman or leadman within two working days for any large spill. Reference page 2 for recommended procedures in case of eye or skin contact.

2.1.5.2 Only personnel wearing fresh air masks should return to the spill area.

2.1.5.3 The spill should be covered with absorbent material, swept up and removed from the area.

2.1.5.4 IRA F-56 should be applied to the spill area and the area should be marked as "hazardous" until it is completely dry.

2.1.5.5 The swept up material should be marked as "hazardous waste" with no further decontamination until Department 601 and 528 are notified.

2.1 Spills - continued

2.1.6 Liquid Spill of Mixed Material. (Polyurethane)

2.1.6.1 If a spill of mixed polyurethane or adhesive material occurs, absorbing material should be spread over the entire area and the materials should be allowed to harden.

2.1.6.2 The Shop Foreman should be notified of the spill. (see Fig. 1).

2.1.6.3 When the mixed material is hard, the spill may safely be scraped or peeled off the floor and discarded as non-hazardous waste.

2.2 Spills - (Non-solid, ground, dirt floors, etc.)

2.2.1 If a spill of any kind should occur on a dirt surface, the spill should be shoveled up including the entire surface in which the spill came in contact.

2.2.2 Spilled material should be placed in a container marked "Hazardous Waste" if applicable.

2.3 Fires

2.3.1 If a fire should break out, the Fire Department should be immediately contacted, followed by the Emergency Coordinator for that building, or for that type of fire. (See Fig. 1).

2.3.2 The fire should be announced over the intercom system and all personnel not involved in responding to the fire should immediately evacuate the building (see facility drawing (Fig. II, III) for fire exits).

2.3.3 The Emergency Coordinator should determine if ISI personnel should attempt to fight the fire prior to the arrival of the fire department. His decision is based on the "controllability" of the fire and on its "isolation" from other flammable materials.

2.3.4 The Emergency Coordinator should be available to the fire department to alert them of potential hazards and to direct them to fire equipment when necessary.

2.3 Fires - continued

2.3.5 All evacuated personnel should congregate in the parking lot and account for all other personnel (each department head should account for all personnel in that department)

2.3.6 Any missing persons should be reported to the fire department as soon as possible.

2.4 Explosions

2.4.1 If an explosion should occur, the fire department should be immediately contacted, followed by the Emergency Coordinator. (see Fig. 1)

2.4.2 The explosion should be announced over the intercom and all personnel should immediately evacuate the building (See Fig. II, III)

2.4.3 The Emergency Coordinator should be available to the fire department to alert them of potential hazards and to direct them to fire equipment when necessary.

2.4.4 All evacuated persons should congregate in the parking lot and account for all other personnel (each department head should account for persons in that department).

2.4.5 Missing persons should be reported to the fire department.

3. EVACUATION PLAN

3.1 Should a fire or an explosion occur, all personnel should evacuate the building at the nearest fire exit (Fig. II, III). Only those trained in fire fighting should stay behind if the Emergency Coordinator so decides.

3.2 Should a spill occur necessitating an immediate evacuation, personnel in area of spill should evacuate the building at the nearest fire exit (Fig II,III).

3.3 Personnel should evacuate the building at one of the following exits:

a)	South Building:	Office	one fire exit
		Shop	five fire exits
b)	North Building:	Office	one fire exit
		Shop:	five fire exits

3.4 Personnel should quickly congregate in the parking lot and check for missing persons.

3.5 Missing persons should be reported to the fire department as soon as possible.

4. EMERGENCY EQUIPMENT

4.1 ABC Fire extinguishers

4.2 Fresh air masks - Organic Cartridge Masks

4.3 Sprinkler System

4.4 Intercom to announce fire/explosion

4.5 Phone connections in both buildings to and from shop and offices.

5. EMERGENCY COORDINATOR RESPONSIBILITIES

5.1 At all times there must be an Emergency Coordinator on the facility premises or on-call with the responsibility for coordinating all response measures. The coordinator must be thoroughly familiar with the contingency plan, all operations and activities at the facility and the facility lay-out.

5.2 Whenever there is an imminent or actual emergency situation, the coordinator must immediately:

a) Notify all personnel of the situation.

b) Notify appropriate state/local authorities if help is needed.

5.3 Concurrently, he must assess possible hazards to human health or the environment.

5.4 Whenever there is a spill, fire, explosion, he must immediately identify the character, source and amount of released materials.

5.5 If the emergency coordinator determines that the facility has had a spill, fire, explosion that could threaten human life or the environment, outside the facility, he must report his findings as follows:

5.5.1 If his assessment indicates that evacuation of local areas is advisable, he must immediately notify appropriate local authorities.

5.5.2 He must immediately notify the national response center (1-800-424-8802) the report must include:

a) Name and telephone number of reporter
b) Name and address of facility
c) Time and type of accident
d) Name and quantity of materials
e) Extent of injuries (if any)
f) Possible hazards to human life (if any)

5.6 During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions and releases do not occur, recur, or spread.

5.7 If a release occurs in an area where hazardous waste is stored, the emergency coordinator must ensure that the following is true of the affected area:

a) No waste that may be incompatible with the released material is treated, stored or disposed of until clean-up procedures are complete.

b) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

c) Operations are not resumed until he has contacted the regional administrator and appropriate local and state authorities to notify that the facility is in compliance with 5.7 a and b.

5.8 The owner/operator must note in the operating record, the time, date, and details of any incident that requires implementing the contingency plan within 15 days. After the incident he must submit a written report on the indicent to the Regional Administrator to include:

a) Name, address, phone number of owner/operator
b) Name, address, phone number of facility
c) Date, time and type of incident
d) Name and quantity of materials involved
e) The extent of injuries, if any
f) An assessment of actual or potential hazards to human health or environment where applicable.
g) Estimated quantity and disposition of recovered material that resulted from incident.

5.9 The following are the names and phone numbers of all personnel qualified to act as emergency coordinators (Fig. #1 shows the priority of emergency coordinators).

5.9.1	Joe Barach -RR1, Box 131A, Chisholm, Mn	254-5676
5.9.2	Jerry Caldwell -RR1, Box 311, Hibbing, Mn	262-1493
5.9.3	Lyle Crego -4931½ 1st Ave., Hibbing, Mn	262-3258
5.9.4	Bill Gulbranson -702 E. 39th St. Hibbing, Mn	262-1982
5.9.5	Nick Miskulin - 2717 E. 16th Ave., Hibbing, Mn	262-1642
5.9.6	Donald Moore - 2033 4th Ave. W. - Hibbing, Mn	262-3191
5.9.7	Bill Valeri - Swan Lake - Pengilly, Mn	885-1846

6. ARRANGEMENTS WITH LOCAL AUTHORITIES

6.1 Fire Department

6.1.1 The fire department will be contacted by Irathane immediately following discovery of a fire.

6.1.2 The Hibbing fire department has on file all safety data sheets for ISI materials (raw materials and finished goods) and, therefore, knows the proper response for all fires therein.

6.1.3 The fire department has two facility drawings on file complete with all fire information pertinent to Irathane.

6.2 Police Department

6.2.1 The police department will be contacted by the fire department following notification of an incident by Irathane.

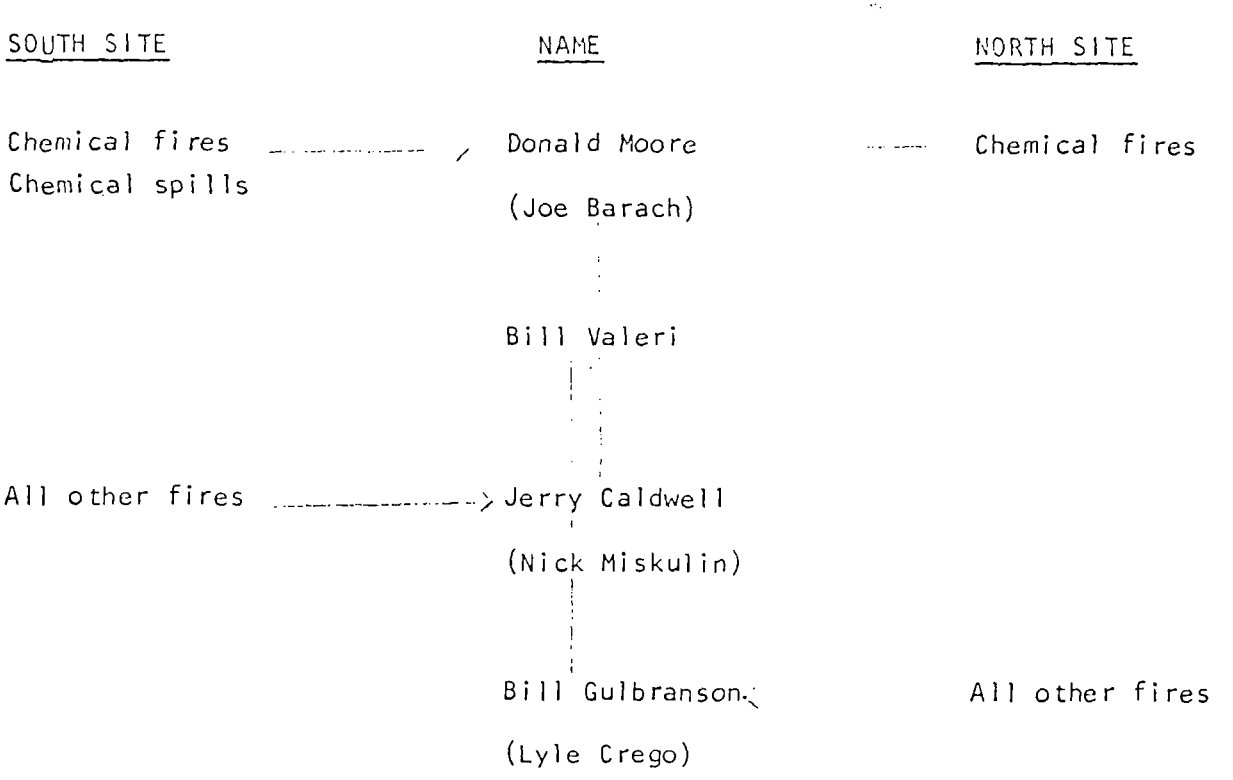
6.2.2 The Hibbing police department has on file two facility drawings complete with all fire information pertinent to Irathane.

6.3 Hibbing Hospital

6.3.1 Should any injury occur due to a sudden incident at Irathane, the victim will be sent to the Central Mesabi Medical Center (Hibbing Hospital).

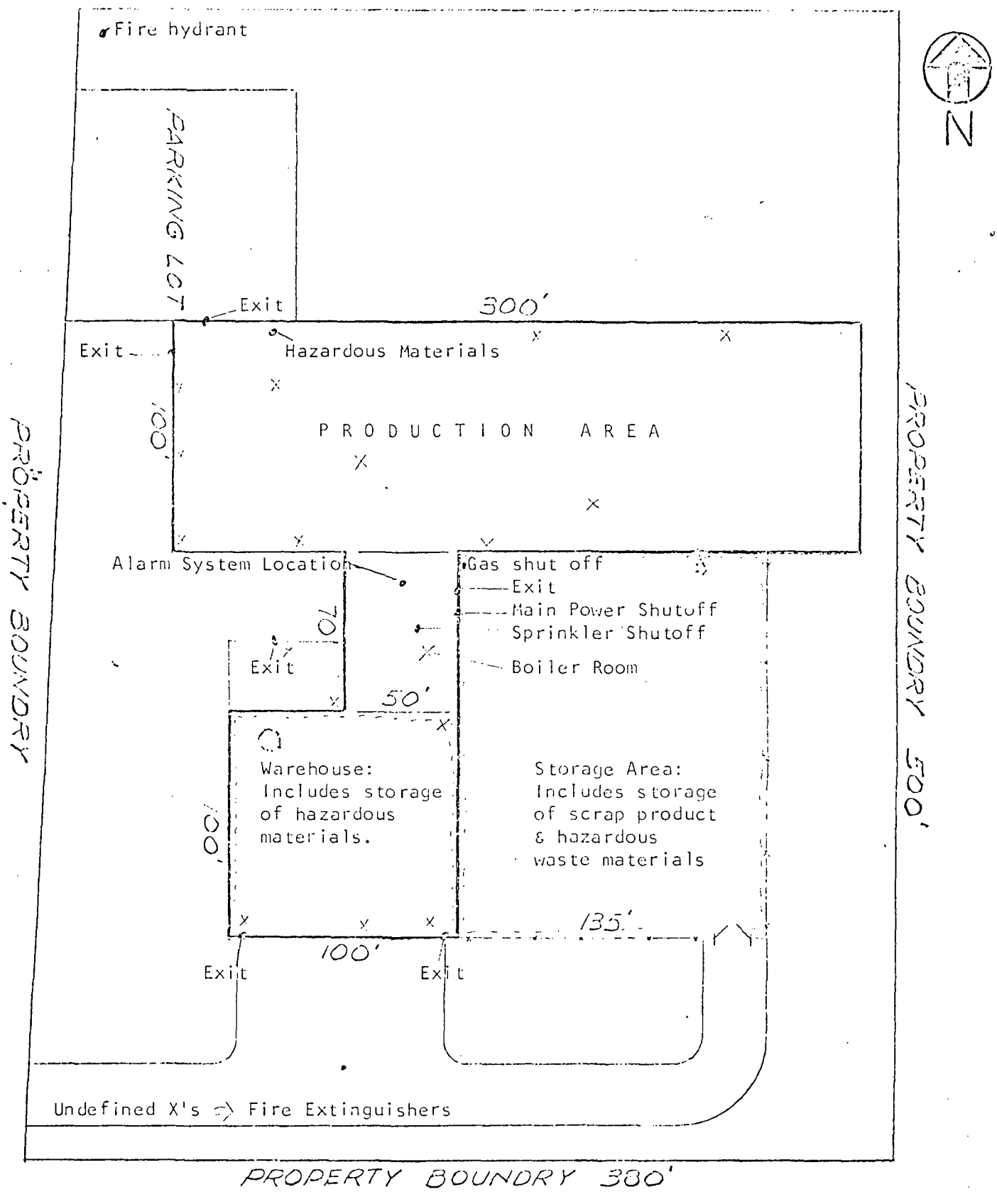
6.3.2 The Medical Center has on file all the Safety Data Sheets for Irathane materials (raw materials and finished products) and therefore, knows how to treat any chemical injury.

EMERGENCY COORDINATOR CONTACTS



FACILITY DRAWING (see page 4)

Fig 11 3516 13th Avenue E., Hibbing, Mn 55746



3804 E. Beltline - Hibbing, Mn 55746

Fig. III